IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

GENERAL ELECTRIC COMPANY,

Plaintiff,

v.

MITSUBISHI HEAVY INDUSTRIES, LTD., and MITSUBISHI POWER SYSTEMS AMERICAS, INC.,

Defendants.

CIVIL ACTION NO. 3:10-CV-276-F

JURY TRIAL DEMANDED

P.R. 4-5(c) JOINT CLAIM CONSTRUCTION CHART

Pursuant to Miscellaneous Order No. 62, ¶ 4-5(c), and the Scheduling Order entered by the Court, Plaintiff General Electric Co. and Defendants Mitsubishi Heavy Industries, Ltd. and Mitsubishi Power Systems Americas, Inc. (collectively, "Defendants") hereby submit the Parties' Joint Claim Construction Chart, attached as Exhibit A. A copy of this submission on disk has also been sent to the Court.

Respectfully submitted,

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EXHIBIT A

JOINT CLAIM CONSTRUCTION CHART

U.S. 6,879,055 Claim 1	GE's Proposed Construction	Mitsubishi's Proposed Construction	Judge's Construction
1. An apparatus, comprising:			
A **base frame**[1] for the arrangement of a	a support structure that carries the drive train and the azimuthal drive device [AGREED]	a support structure that carries the drive train and the azimuthal drive device [AGREED]	a support structure that carries the drive train and the azimuthal drive device [AGREED]
drive train,[2] which is driven by a wind-driven rotor of a wind power plant, on the tower of the wind power plant on which the base frame is affixed with an essentially horizontal orientation of the rotor axis so that it can rotate azimuthally around the essentially vertical axis of the tower	a wind turbine rotor hub, rotor shaft and an electric generator connected through a gear(s) [AGREED]	a wind turbine rotor hub, rotor shaft and an electric generator connected through a gear(s) [AGREED]	a wind turbine rotor hub, rotor shaft and an electric generator connected through a gear(s) [AGREED]
and is constructed from a discrete upper part that carries the drive train and a discrete lower part that has an azimuthal drive device that is attachably joined with the upper part at a **connection point**,[3] wherein the lower part provides for azimuthal rotation around the essentially vertical axis of the tower, wherein the **connection point** extends along an essentially horizontal cross-section that has a larger dimension in the direction of the rotor axis than in the direction perpendicular to that.	area of contact between the upper part and lower part of the base frame	the point where the lower part and the upper part are joined together to form the base frame	

[1] "Base frame" appears in claims 1, 2, 13, and 15-16 of the '055 patent. GE has not asserted claims 2, 13, or 15-16.
[2] "Drive train" appears in claims 1, 13, and 15 of the '055 patent. GE has not asserted claims 13 or 15.
[3] "Connection point" appears in claims 1-4, 6, 13, and 15-17 of the '055 patent. GE has not asserted claims 2, 4, 6, 13, or 15-17.

U.S. 6,879,055 Claim 3	GE's Proposed Construction	Mitsubishi's Proposed Construction	Judge's Construction
3. The apparatus according to claim 1, wherein the **connection point**[4] of both the upper part and the lower part extends in a plane extending parallel to the rotor axis and perpendicularly to the tower axis.	area of contact between the upper part and lower part of the base frame	the point where the lower part and the upper part are joined together to form the base frame	

U.S. 6,879,055 Claim 12	GE's Proposed Construction	Mitsubishi's Proposed Construction	Judge's Construction
12. The apparatus according to one of the claims 1, 2 or 3, wherein, on the upper part, two supports that extend away from its end that faces away from the rotor essentially in the direction of the rotor axis are arranged, on which at least one generator of the wind power plant can be supported.[5]			

[4] As noted *supra* at note 3, "connection point" appears in claims 1-4, 6, 13, and 15-17 of the '055 patent. GE has not asserted claims 2, 4, 6, 13, or 15-17.
[5] The parties have not requested the Court to construe, and do not dispute the meaning of, any term appearing in claim 12 of the '055 patent.

U.S. 7,629,705 Claim 1	GE's Proposed Construction	Mitsubishi's Proposed Construction	Judge's Construction
1. A method for operating an electrical machine, said method comprising:			
coupling the **electrical machine**[6] to an electric power system such that the electric power system is configured to transmit at least one phase of electric power to the electrical machine;	a device that can convert mechanical energy to electrical energy or electrical energy to mechanical energy [AGREED]	a device that can convert mechanical energy to electrical energy or electrical energy to mechanical energy [AGREED]	a device that can convert mechanical energy to electrical energy or electrical energy to mechanical energy [AGREED]
and **configuring the electrical machine such that the electrical machine remains electrically connected to the electric power system during and subsequent to a voltage amplitude of the electric power system operating outside of a predetermined range for an undetermined period of time**,[7] said configuring the electrical machine comprising:	setting up the electrical machine such that the electrical machine remains electrically connected to the electric power system during and subsequent to a voltage amplitude of the electric power system operating outside of a range determined in advance for a time period not determined in advance	setting up the electrical machine such that the machine remains connected to the electric power system during and subsequent to the voltage amplitude operating outside of a defined range, with no time limits placed on the period of time the machine remains connected to the electric power system when the voltage is outside the range	
electrically coupling at least a portion of a control system to at least a portion of the electric power system;			

[6] "Electrical machine" appears in claims 1-4, 6, 13, and 15-17 of the '705 patent. GE has not asserted claims 2-4, 6, 13, or 15-17.
[7] The disputed claim term appears only in claim 1 of the '705 patent.

coupling the control system in electronic data communication with at least a portion of the electrical machine;			
and **configuring the electrical machine and the control system such that the electrical machine remains electrically connected to the electric power system during and subsequent to the voltage amplitude of the electric power system decreasing below the predetermined range including approximately zero volts for the undetermined period of time, thereby facilitating zero voltage ride through (ZRVT).**[8]	setting up the electrical machine and the control system such that the electrical machine remains electrically connected to the electric power system during and subsequent to the voltage amplitude of the electric power system decreasing below the range determined in advance, including approximately zero volts, for the time period not determined in advance, thereby facilitating zero voltage ride through (ZVRT)	setting up the electrical machine and the control system such that the machine remains connected to the electric power system during and subsequent to the voltage amplitude decreasing below the defined range, including to approximately zero volts, with no time limits placed on the period of time the machine remains connected to the electric power system when the voltage is below the range	

[8] The disputed claim term appears only in claim 1 of the '705 patent.